

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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In re: Michael A. Gral,

Case No. 16-21329-gmh

Debtor.

Chapter 7

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**SECOND APPLICATION BY TRUSTEE TO EMPLOY  
ATTORNEY NATHANIEL CADE, JR. AND CADE LAW GROUP, LLC  
AS ATTORNEY FOR THE TRUSTEE**

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NOW COMES, Steven R. McDonald, trustee of the above-captioned case (“Trustee”), who applies to the Court for authority to employ Attorney Nathaniel Cade, Jr. and Cade Law Group LLC as attorney for the Trustee, pursuant to 11 U.S.C. §327(a). This is the second application to employ Attorney Cade, and the services requested are separate and distinct from those included in the previous application filed on May 13, 2019. In support, the Trustee states as follows:

1. On February 20, 2016, an order for relief under Chapter 11 of the Bankruptcy Code was entered in this case. The Debtor converted to a Chapter 7 on March 20, 2019.
2. The undersigned is the qualified and acting trustee in this Chapter 7 case.
3. The Trustee desires to employ Attorney Nathaniel Cade, Jr. and Cade Law Group, LLC in the professional capacity of Attorney for the Trustee.
4. The legal services to be rendered and the estimated cost for each such service are as follows:

Steven R. McDonald, Chapter 7 Trustee 7280 S. 13 <sup>th</sup> Street, Suite 103 Oak Creek, WI 53154 (414) 226-2200 Phone/(414) 289-8384 Fax smcdonald@mcdonaldlawllc.com
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- a. Recover assets on behalf of the bankruptcy estate. The pursuit of those assets may include discovery, litigation, negotiations, and other necessary tasks to locate and recover said assets.
5. The Applicant's compensation will be a contingency basis of 30% plus out-of-pocket costs and expenses.
6. The Trustee has made the following personal efforts to resolve this matter on his own: None.
7. Attorney Nathaniel Cade, Jr. of Cade Law Group LLC is experienced in the matters for which Applicant is to be employed and is qualified to represent the Trustee. Mr. Cade earned his law degree from the University of Michigan Law School in 1996. Mr. Cade is licensed to practice law in State of Wisconsin, and is a member of the State Bar of Wisconsin. Prior to forming his own law firm, Mr. Cade was a partner and the general counsel at Gonzalez Saggio & Harlan, large multi-office law firm and a partner with Michael Best & Friedrich LLP. Currently, he is the owner of Cade Law Group LLC in Wisconsin practicing in, among other areas, civil litigation, with an emphasis on complex commercial disputes. Attorney Cade also has litigated bankruptcy matters.
8. In this case, the Trustee has made the following efforts to obtain comparable services at a lower cost: The Trustee discussed hiring attorneys Michael Dunn and Douglas Mann with those individuals and they both stated that they had previous conflicts in this matter that would prevent them from representing the estate. The Trustee has reviewed this matter and discussed it with Attorney Cade and is of the opinion that due to the nature of this case and its complexity that this is the reasonable value of the

services to be provided. Accordingly, an experienced trial attorney is required to maximize the potential for a favorable outcome on behalf of the bankruptcy estate.

9. For the preceding reasons, the Trustee believes it is in the best interest of the estate to employ the above-named attorney or firm to perform the services set forth at the cost set forth. This is a complex case.
10. The Trustee has read the attorney's Affidavit of Disinterest made pursuant to F.R.B.P. 2014 and, to the best of the Trustee's knowledge, believes the affidavit to be true and correct.
11. No fees shall be paid to said attorney and/or firm except upon proper application to and approval by the Court.

WHEREFORE, the Trustee requests an Order authorizing the Trustee to employ the above-referenced attorney and firm in accordance with the terms and provisions of this second application. The Trustee does not intend to file a brief in connection with this second application, but reserves the right to file a responsive brief, if necessary.

Dated this 14th day of May, 2019.

/s/ Steven R. McDonald  
Steven R. McDonald, Trustee  
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